

1 Britta E. Warren, OSB No. 065441
bew@bhlaw.com
2 BLACK HELTERLINE LLP
805 S.W. Broadway, Suite 1900
3 Portland, OR 97205
Telephone: (503) 224-5560
4 Fax: (503) 224-6148
Of Attorneys for David G. Law and Darrell L. Deem,
5 *as individuals and on behalf of their Roth IRAs,*
DJ Property Solutions, LLC, and Deem Funding Realty
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9 UNITED STATES BANKRUPTCY COURT
10 FOR THE DISTRICT OF OREGON

11 In re

12 MICHELLE ANNE BARON,

13 Debtor.
14

Case No. 18-32159-tmb7

**MOTION FOR ORDER
EXTENDING DEADLINES TO FILE
COMPLAINT OBJECTING TO
DISCHARGE**

15 COMES NOW David G. Law, an individual and on behalf of his Roth IRA
16 #11396 (“Law”), Darrell L. Deem, an individual and on behalf of his Roth IRA #14459
17 (“Deem”), DJ Property Solutions, LLC, and Deem Funding Realty (collectively, the
18 “Creditors”), hereby move the Court for an order extending the deadlines for Creditors to file a
19 complaint objecting to debtor Michelle Baron’s discharge pursuant to 11 U.S.C. § 523(a) and
20 for denial of the discharge under 11 U.S.C. § 727(a) (the “Motion”) to November 13, 2018
21 which is a 60 day extension.

- 22 1. This voluntary chapter 7 case was filed on June 21, 2018.
23 2. The chapter 7 meeting of creditors pursuant to 11 U.S.C. § 341(a) was
24 scheduled and concluded on July 19, 2018.

1 3. Fed. R. Bankr. P. 4004(a), (b) and 4007(c) require that complaints objecting to
2 discharge must be filed within sixty days following the first date set for the meeting of
3 creditors held pursuant to § 341(a) unless the court extends the time for filing such a
4 complaint. The sixty-day period will expire on or about September 17, 2018.

5 4. On or about October 16, 2015, Creditors sued Tracey and Michelle Baron, as
6 well as multiple entities owned and controlled by Tracey and Michelle Baron, including
7 without limitation, Turning Leaf Homes, LLC, RenX Group, LLC, Big Blue Capital, Turning
8 Leaf Advisors, RenX Group II, LLC, and Crimson Investment Group, LLC in the United
9 States District Court for the District of Utah, Case No. 2:15-cv-00755-DS, entitled *Deem, et al.*
10 *v. Baron, et al.* (the “Litigation”).

11 5. The Litigation includes claims against Michelle Baron for fraud and conversion.

12 6. Creditors believes that grounds exist for Creditors to file a complaint for
13 nondischargeability under 11 U.S.C. § 523(a) and 11 U.S.C. § 727(a). Creditors request
14 additional time to investigate and evaluate this matter before making a final decision whether
15 to file a complaint.

16 DATED this 14th day of September, 2018.

17 BLACK HELTERLINE LLP

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19 By: s/ Britta E. Warren
20 Britta E. Warren, OSB No. 065441
21 bew@bhlaw.com
22 Fax: (503) 224-6148
23 Of Attorneys for David G. Law and Darrell L.
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 Funding Realty

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing
MOTION FOR ORDER EXTENDING DEADLINES TO FILE COMPLAINT
OBJECTING TO DISCHARGE upon all ECF participants registered with the Court to
receive electronic notice as of the date of the entry of this pleading electronically via
CM/ECF System on the date set forth below.

DATED this 14th day of September, 2018.

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